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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING IMPLEMENTATION PLAN FOR NAVY ENVIRONMENTAL
LEADERSHIP PROGRAM TECHNOLOGY DEMONSTRATION FOR BIOAUGMENTATION
FOR SOLID WASTE MANAGEMENT UNIT 15 (SWMU15) NS MAYPORT FL
10/19/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 19, 1995

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC. 29419-9010

file: nelp_imp.doc

RE: Review of Implementation Plan - NELP Technology Demonstration for
Bioaugmentation at SWMU 15, NAVSTA Mayport

Dear David:

I have reviewed the above named document dated September, 1995 (received September 18, 1995) and offer the following comments, which should be considered in conjunction with my related comments of October 3, 1995 on the FIFCO Revised Remedial Action Plan:

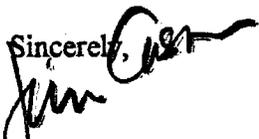
1. I agree with the proposal for ABB to collect statistically random and biased samples based on the rationale of prior analytical knowledge and the "hot spot" distribution of contaminants.
2. As noted in my review of the FIFCO Remedial Action Plan, it is desirable that, to the degree possible, field samples obtained and evaluated by FIFCO should duplicate the ABB confirmatory sample sites since they are based on known and statistically-derived data points.
3. Section 3.1, bullet 4: soil samples: will the mentioned soil samples be obtained by FIFCO personnel or by ABB?
4. As we have discussed on several previous occasions, the section on Uncertainty will be useful in helping evaluate the work achieved during the demonstration when considering the "hot spot" distribution of contaminants and the relatively unknown remediation media (Bacterra[®]).

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-9994.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Mr. David Driggers
October 19, 1995
Page two

Sincerely, 
James H. Cason
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, OGC/Trustee File
Terry Hansen, ABB Environmental Services, Tallahassee
Satish Kastury, FDEP, Tallahassee
Brian Cheary, FDEP Northeast District, Jacksonville

TB  JJC  ESN 